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# EXHIBIT C

Thomas C. Wright, Jr., M.D.

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON

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)  
IN RE: ETHICON, INC., ) Master File No.  
PELVIC REPAIR SYSTEM PRODUCTS ) 2:12-MD-02327  
LIABILITY LITIGATION )  
) MDL-2327  
-----X  
)  
THIS DOCUMENT RELATES TO THE )  
FOLLOWING CASES IN WAVE 1 OF ) JOSEPH R. GOODWIN  
MDL 200: ) U.S. DISTRICT JUDGE  
)  
)  
DEE MCBRAYER AND TIMOTHY ) Civil Action No.  
MCBRAYER, )  
Plaintiff ) 2:12-CV-00779  
vs. )  
ETHICON, INC., ET AL. )  
Defendant. )  
)  
-----X

DEPOSITION OF THOMAS C. WRIGHT, JR., M.D.

New York, New York

March 29, 2016

Reported by:

MARY F. BOWMAN, RPR, CRR

Golkow Technologies, Inc. - 1.877.370.DEPS

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1 pathologist, correct?

2 A. Correct.

3 Q. And within the field of  
4 pathology, there are some subspecialties.  
5 As I understand it, you are an anatomic  
6 pathologist?

7 A. Correct.

8 Q. That means, Doctor, that your  
9 medical practice has been one in which you  
10 have looked at and interpreted tissue  
11 samples over your career, fair?

12 A. Fair.

13 Q. You have not been a clinician in  
14 your medical practice?

15 MR. COMBS: Object to form.

16 Q. There will be times --

17 A. In which I don't know what to do.

18 Q. I will talk to you about your  
19 history testifying in a second.

20 There will be times today where  
21 counsel for Ethicon may make an objection.  
22 That objection can only be ruled on by  
23 somebody who is not in the room today.

24 So for the purposes of the

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1 transcript, he will make an objection,  
2 preserve it for the record, and then the  
3 day will come where that objection may be  
4 heard, but you get to go ahead and answer  
5 to the best of your ability. Fair?

6 MR. COMBS: At all times today,  
7 go ahead and answer the question,  
8 unless I were to direct you not to  
9 answer. The likelihood of that  
10 happening is very small. It would only  
11 be if Mr. Perdue were to ask a question  
12 that I thought invoked privileged  
13 materials or something like that.

14 For the vast majority, what will  
15 happen today, either if I'm asking a  
16 question and Mr. Perdue objects, or if  
17 he asks you a question and I object,  
18 you just keep rolling.

19 THE WITNESS: OK.

20 MR. COMBS: We will let you know  
21 if anything changes.

22 A. For a number of years at  
23 Columbia, I ran the colposcopy clinic,  
24 which is pretty invasive disease. So I saw

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1 patients having preinvasive cervical  
2 disease.

3 Q. And colposcopy is basically a  
4 cervical biopsy?

5 A. Colposcopy is looking at the  
6 cervix with a microscope, a long-range,  
7 dissecting microscope. We look, we  
8 identify areas of abnormality, we take  
9 biopsies, and then if we find a  
10 precancerous condition, we treat it locally  
11 with excessive types of methods.

12 Q. Let me back up to your  
13 background, training and experience.

14 Can you tell us, Dr. Wright, what  
15 Wright Exhibit 2, which is marked and is in  
16 front of you, is?

17 A. This is my CV.

18 Q. Does your CV in effect serve as  
19 your resume and a description of your  
20 education, training and experience in the  
21 field of medicine?

22 A. It does.

23 Q. If I look at Wright Exhibit 2,  
24 Doctor, I see that you completed a

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1           residency in pathology, true?

2           A.       That is correct.

3           Q.       And then after your residency in  
4           pathology, you went on to do what's called  
5           a fellowship in gynecologic/obstetric  
6           pathology some years later, fair?

7           A.       Fair.

8           Q.       The difference between a  
9           residency and a fellowship is, after a  
10          student of medical school attends three  
11          years of medical school, they essentially  
12          choose their specialty path going forward,  
13          true?

14          A.       Yes.

15          Q.       Your choice as of the third year  
16          of medical school, or your placement, was  
17          in the field, the subspecialty of medicine  
18          called pathology, correct?

19          A.       Correct.

20          Q.       From the practice then as a  
21          pathologist after completed a residency,  
22          you continued on to do some subspecialty  
23          education called a fellowship training in  
24          obstetric and gynecologic pathology, fair?

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1           A.       I did. After an interim where I  
2           was a researcher at Harvard Medical School,  
3           and also acted as an attending pathologist  
4           at the Brigham and Women's.

5           Q.       So that's what I wanted to talk  
6           to you about. So your medical school  
7           training was at Harvard Medical School,  
8           correct?

9           A.       Correct.

10          Q.       And then your pathology was -- it  
11          just says your pathology residency, it says  
12          department of pathology, Boston. Is that  
13          a -- was the residency done at Harvard  
14          Medical School as well?

15          A.       It was done at Harvard Medical  
16          School, the Brigham and Women's Hospital,  
17          which is one of the Harvard teaching  
18          hospitals.

19          Q.       I understand now.

20                  From -- it looks like in just  
21          looking at your CV, and not knowing, but  
22          after a period of time in your education,  
23          you left Boston and came to New York?

24          A.       Correct.



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1           Q.     Two days a week you have some  
2     role looking at specimens through Columbia  
3     Medical Center?

4           A.     Two days a week -- just so we are  
5     clear, I'm a professor emeritus, so I do  
6     not do routine anatomical pathology at  
7     Columbia. Two days a week, I go in, I do  
8     my research projects, I write papers, I  
9     talk to residents.

10                     And I look at the difficult cases  
11     through the microscope that the other --  
12     that the attendings in gynecological  
13     pathology are interested in getting my  
14     opinion.

15           Q.     So that we are clear and fair  
16     then, since 2011, you have not been an  
17     attending pathologist through a hospital or  
18     medical center?

19           A.     Since 2013.

20           Q.     Since 2013.

21                     So in 2013, you ceased to serve  
22     as an attending pathologist, that is a  
23     full-time practicing clinical pathologist,  
24     correct?



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CERTIFICATE

STATE OF NEW JERSEY )

) ss:

COUNTY OF UNION )

I, MARY F. BOWMAN, a Registered Professional Reporter, Certified Realtime Reporter, and Notary Public within and for the State of New Jersey, do hereby certify:

That THOMAS C. WRIGHT, JR., M.D., the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record of the testimony given by such witness.

I further certify that I am not related to any of the parties to this action by blood or marriage and that I am in no way interested in the outcome of this matter.

In witness whereof, I have hereunto set my hand this 29th day of March, 2016.

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